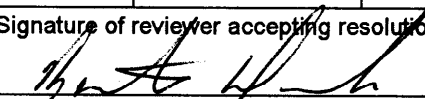


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Technical Point of Contact:	Phone No.:	Return Comments To:	MS:	E-Mail:	Comments Due By:	Reviewer's Name/Discipline: Idaho DEQ	Phone No.:
Comments resolved by: Brandon Smith		Date: 04/03/01		Signature of reviewer accepting resolution of significant comments: 		Date: 10/3/01	

* Comments so marked are considered to be significant and must be resolved to the reviewer's satisfaction. *Significant comment.* A reviewer's written response that is derived from the reviewer's area of expertise or discipline or that addresses material assigning tasks to the reviewer's organization. Significant comments address issues of: A. noncompliance with laws, regulations, permits, standards, B. proper conduct of mission-critical operations, C. creating unsafe conditions that could result in personal injury, death, damage to the environment, D. creating conditions that could result in significant nonessential costs to the company.

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	General		<p>Based on anecdotal evidence some of the possible types of construction gases are listed in the document (acetylene, carbon dioxide, oxygen, nitrogen, compressed air, helium and argon). There are however, many types of construction gases. Some of the other gases that may be encountered during excavation activities may include ammonia, chlorine, ethane, ethylene, hydrogen, methane, nitrous oxide, propane, refrigerants, sulfur dioxide, etc. Hydrogen fluoride cylinders were found at CPP-94 (not very far away), and the possibility exists that some may have been disposed at site CPP-84. It is recommended that a contingency plan be developed to deal with these "other" gases that are not expected to be present. This would alleviate work stoppage and allow a course of action if unknowns are encountered.</p> <p>With the removal action that was accomplished at CPP-94, a cylinder of hydrogen fluoride has basically ended up without a home. To avoid this possibility at CPP-84 it is important to develop back-up plans in case a treatment method such as thermal oxidization cannot be used for whatever reason.</p>	<p>RESPONSE: The INEEL has established procedures for the management of all types of compressed gases that could potentially be encountered during this project. Language has been added to the "Status of Assumption #3" in Section 4 addressing how to manage unexpected waste items. A table has been added to the Waste Management Plan (Attachment 4 of the RD/RAWP) addressing each category of gas based on the hazard class (other than what is already anticipated for retrieval). The table will provide a reference to the applicable management procedure should an unexpected gas be excavated. This will provide a clear direction for the management of any unexpected cylinders retrieved minimizing the potential a work stoppage.</p> <p>Treatment and disposition of any other gases retrieved will be assessed on a case by case basis. Depending on the gas, it may be treated on-site if amenable to treatment processes addressed in the RD/RAWP or will be managed at an appropriate off-site TSDF.</p>		
1	<u>Table of Contents, page vi</u>		Correct page numbers for Sections 3.3 through 3.4.3.	Response: This change has been made as requested		
2	<u>Section 1.1</u>		Since Both the Scope of CPP-84 and CPP-94 are discussed in the first section it would be	Response: The following sentence was added		

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	<u>Background, page 1-1</u>		helpful to include CPP-94 in the Background section along with a reference to the location on Figure 1-1 (as was done for CPP-84).	to the end of the paragraph: "Site CPP-94 is located approximately 610 meters (2,000 feet) to the northeast of the INTEC security fence. Six HF cylinders have been retrieved from Site CPP-94."	
3	<u>Section 1.1 Background, page 1-1, first paragraph, third sentence</u>		The sentence should state something to the effect that: "Anecdotal evidence from interviews of personnel involved and records available indicate that approximately 40 to 100 compressed gas cylinders were buried..."	Response: This change has been made as requested.	
4	<u>Section 1.1 Background, page 1-2, first paragraph, fourth sentence</u>		The sentence should contain both records and interviews "Records and anecdotal evidence indicate that these cylinders contained..."	Response: This change has been made as requested.	
5	<u>Section 1.1 Background, page 1-2, second paragraph, last sentence</u>		Does the high-resolution magnetic survey provide any clue as to the accuracy of the estimated number of cylinders present?	Response: The survey does not provide enough resolution to indicate individual cylinders. Therefore no changes have been made to the work plan.	
6	<u>Section 1.1 Background, page 1-2, second paragraph, last sentence</u>		The document later states that the location of the trench has been marked/flagged. According to the Record of Decision there should be " <i>institutional controls (i.e. warning signs) until completion of the buried cylinder removal.</i> " Please state what institutional controls are present at Site CPP-84.	Response: The marking and flagging and warning signs used to control access to this area are described in Section 6.20.3. This section of the "Background" is simply describing the fact that surveys clearly show the outline of the area requiring excavation. Since the operational chapter of the work plan adequately addresses the institutional controls that will be implemented, no changes have been made to this section.	
7	<u>Section 1.3.1 Site CPP-84 Scope, page 1-2, first paragraph</u>		Recommend adding the step of checking cylinder integrity during the excavation and before the removal of the cylinders.	Response: This scope section simply provides a brief overview of the process. The specific steps that will be implemented to remove the cylinders are discussed in detail in section 6 of the RD/RAWP. Specifically section 6.20.2.2 contains the requirements for checking cylinder integrity prior to removal.	

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8	<u>Section 1.3.1 Site CPP-84 Scope, page 1-2, eighth sentence</u>		It may be more appropriate to indicate that, after treatment, the cylinders will be rendered "empty" in accordance with the definition in IDAPA 58.01.05005 [40 CFR 261.7(a) (1), (b)(2).]	<p>Response: The seventh and eighth sentences have been revised as follows:</p> <p>"It is anticipated that treatment methods will include venting of inert gases to render the cylinder empty and thermal oxidation of flammable gases. After treatment, the empty cylinders will be rendered useless and disposed at INEEL landfill. Backfilling and site grading will complete the field operation at CPP-84."</p> <p>The reference to the IDAPA definition of empty cylinders has been added to Section 7.3 of work plan and to Sections 6.2 and 7.1.1 of the Waste Management Plan.</p> <p>The need to store an empty cylinder in a weather protected structure has also been deleted.</p>	
9	<u>Section 1.3.1 Site CPP-84 Scope, page 1-2, first paragraph, last sentence</u>		Please add soil sampling prior to backfilling and site grading to complete the field activities at CPP-84.	Response: No changes have been made since the third sentence of this paragraph already addresses soil sampling: "Following the removal of the cylinders, confirmation soil samples will be collected from the floor of the excavation".	
10	<u>Section 1.3.2 Site CPP-94 Scope, page 1-5, first paragraph, last sentence</u>		There should be a plan about what to do with the sixth cylinder that is presently in storage and undergoing weekly inspections. The statement makes it sound as if this is the final disposition of the cylinder. A proper course of action needs to be described.	Response: This cylinder is currently being managed at an off-site commercial TSD facility pending transfer to a treatment facility that will treat the waste to meet applicable treatment standards. Activities are being conducted to contract a facility to complete the treatment. The text of this paragraph has been revised to reflect this.	
11	<u>Section 1.3.2 Site CPP-94 Scope, page 1-5, last paragraph, first sentence</u>		Add (attachment 1) to the Preliminary Characterization Plan.	Response: This change has been made as requested.	
12	<u>Section 2 Organization,</u>		The positions of the individuals in key roles are on Figure 2-1, not the names.	Response: Names have been added to the figure, along with a notation that indicates the names are	

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	<u>page 2-1, second sentence</u>			current as of 3/5/01, and are subject to change.	
13	<u>Section 2.1.6 Visitors, page 2-3, second sentence</u>		Please add the acronym JSS to the acronym list.	Response: This change has been made as requested.	
14	<u>Section 2.2.2 Radiological Engineer, page 2-4, last sentence</u>		Please add Company Manuals 15A and 15B to the list of references.	Response: The use of Company Manuals 15A and 15B have been removed from the document since the RCT will use guidance from the project HASP. The new sentence reads: "The RE may have other duties to perform as specified in other sections of the HASP."	
15	<u>Section 2.3.1 Environmental Restoration (ER) Director, page 2-4, first sentence</u>		The ERP is listed in the acronym list, as the Emergency Response Plan not the Environmental Restoration Program.	Response: The acronym list has been revised to indicate ERP is the acronym for the ER Program.	
16	<u>Section 3 Design Criteria, page 3-1, last sentence</u>		Please add ARARs to the list of DOE orders, OSHA regulations, and industry standards.	Response: This section has been revised to specifically identify applicable drivers.	
17	<u>Section 3.1 Project Description, page 3-1, third paragraph</u>		It should be emphasized that the cylinders will be thoroughly inspected for any potential concerns (i.e. dents, scrapes, bulges, corrosion, pitting etc. that may make the cylinder unsafe to move) prior to their excavation.	Response: The following sentence has been added: "Prior to removal from the excavation site, the cylinders will be inspected for integrity."	
18	<u>Section 3.1 Project Description, page 3-1, third paragraph, last sentence</u>		In other sections of the document and the accompanying attachments, the cylinders containing compressed air, argon, carbon dioxide, helium, nitrogen and oxygen are mentioned as "inert" or "elemental" gases. Here they are referred to as "benign" gases. Since no other gases are suspected to be buried in the trench, it would be helpful to use a consistent phrase throughout the document.	Response: The document has been revised to remove the use of the term "benign" for consistency. "Inert" is used throughout the document.	
19	<u>Section 3.1.2 Treatment Methods, page 3-2</u>		There is a lack of detail for the treatment methods mentioned. It would assist the reader if either the appropriate section of the document where more detail is provided can be referenced, or a brief explanation of the type of complex catalytic or chemical oxidation that may be employed.	Response: Detail has been added to Section 7.3 which describes the treatment processes in more detail and a reference added to the design and operating procedures which will be maintained at	

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				the job site.	
20	<u>Section 3.1.3 Disposal Methods, page 3-2, second sentence</u>		The best method to ensure that the cylinders are rendered useless would entail both cutting and valve removal. Cylinders found with only the valves removed can easily be re-used.	<p>Response: This sentence has been revised as follows:</p> <p>“These cylinders will be rendered useless through valve removal and cutting or puncturing.”</p> <p>This approach has been added to the remainder of the document as well where the issue is addressed.</p>	
21	<u>Table 3-2 Post Removal DOOs, page 3-5, Decision Inputs for CPP-84</u>		There should be a decision input to address other COPCs as required, this would be in case cylinders containing other types of chemicals are discovered during the excavation process.	<p>Response: The following sentences were added to section 3.2.2:</p> <p>“The table only addresses COPCs that may be present due to the waste types expected to be excavated. If other waste types are identified during the removal action, additional parameters will be evaluated on a case by case basis.”</p>	
22	<u>Section 3.3.3 Performance Measurement Points, page 3-6, last sentence</u>		It should be mentioned that at the INEEL, typically there are no significant findings resulting from the pre-final inspection, and that a final inspection is not required (RD/RA Guidance for the INEL, Sections 5.4.1 and 6.3.5, October 1993). This essentially means the pre-final becomes the final inspection. The FFA Section 12.2 states that the draft of the RA report is due within 60 days of the final inspection. The problem lies with the current schedule, which has the draft RA report due almost 4 months following the pre-final inspection. Since the date of the final inspection is included in the pre-final report, technically this is acceptable. The only problem would be that if the pre-final becomes the final inspection, the date in the schedule would have to be accelerated to meet the 60-day requirement.	<p>Response: The following note has been added to the end of section 3.3.3:</p> <p>“If it is determined that the pre-final inspection will serve as the final inspection, the date for submitting the final inspection will be 60 days after making this determination.” The project schedule located in Appendix B has been modified to reflect this.</p>	
23	<u>Section 3.4.3 Cylinder Integrity, page 3-7, last sentence</u>		The use of cylinder over packs brings up a question of what to do with cylinders that do not fit in over packs? A good example includes bent or bulging cylinders.	<p>Response: Cylinder over pack vessels will be available that are capable of holding multiple cylinders. These will be used for bent or bulging cylinders that do not fit into individual cylinder over packs. A sentence was added to the end of the section indicating this.</p>	
24	<u>Section 4.1 Status of Record of</u>		Change “Recover” to “Recovery.”	<p>Response: This change has been made as requested.</p>	

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	<u>Decision Assumptions, page 4-2, last bullet</u>				
25	<u>Section 4.2 Summary, Assumption #2, page 4-2</u>		<p>Since DEQ is now a department and is no longer under IDHW, all of the old IDAPA 16 series rules are now IDAPA 58 series. For example IDAPA 16.01.05.008 is now IDAPA 58.01.05.008. Idaho's administrative rules are available at: http://www2.state.id.us/adm/adminrules/</p> <p>Please change this reference throughout the document (check Table 4-1).</p> <p>IDAPA should be added to the acronym list.</p>	<p>Response: A statement has been added to the introduction (Section 1.0) clarifying that IDAPA references in the document as 16.01.05... are in fact referring to 58.01.05, but have been left in the old numbering scheme for consistency with the ROD.</p> <p>IDAPA has been added to the acronym list.</p>	
26	<u>Section 4.2 Summary, Status of Assumption #2, page 4-2</u>		Although the cylinders at CPP-94 have been successfully removed, one hydrofluoric acid cylinder remains on site. It is possible that there may be "other" cylinders discovered during the excavation at CPP-84. There should be a contingency plan in place to deal with cylinders that may contain hazardous materials so that they do not end up being stored at the site for an indefinite period of time until a disposal method is found.	Response: See the response to the general comments on Page 1.	
27	<u>Section 4.2 Summary, Assumption #3, page 4-3</u>		It is important to have a contingency plan to deal with cylinders that are excavated that may contain hazardous materials (other than those listed in the plan). The fact that this is a disposal site, there is a possibility that other wastes (some that may be hazardous) may also exist in the buried area. There need to be options for dealing with material that may be excavated. This "other" material may require off-site treatment. In this case LDRs may apply.	<p>Response: If cylinders with contents other than those anticipated to be present are excavated, they will be managed in accordance with response made to the general comment on page 1. All of the anecdotal evidence shows that no other materials should be found in the excavation area. This is further supported by the fact that the area 94 retrieval was completed without finding any other wastes. In the event that other wastes are identified, they will be managed on a case by case basis in accordance with the properties of the waste that is found. The wastes will be stored in a storage area appropriate for the waste type, and the proper disposition pathway will be identified based on the waste's characteristics and regulatory status. Language has been added under the "Status of Assumption #3" addressing the</p>	

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				management of unexpected items should they be found.	
28	<u>Section 4.4 Table 4-1, Page 4-6, IDAPA 16.01.05.008 (40 CFR 264.553), comment column, third paragraph</u>		Areas designated near the excavations to temporarily store and treat cylinders containing acetylene or other hazardous wastes would be considered temporary units.	Response: The comment has been revised to indicate that the areas will be considered temporary units.	
29	<u>Section 4.4 Table 4-1, Page 4-6, IDAPA 16.01.05.008 (40 CFR 264.310), comment column, last paragraph, last sentence</u>		Please add "or soils with contaminant concentrations above risk-based levels" after "cylinders."	Response: This change has been made as requested.	
30	<u>Section 4.4 Table 4-1, Page 4-7, IDAPA 16.01.05.005, comment column, last sentence</u>		The IDEQ supports a site-specific treatment variance requested for non-liquid wastes assigned the U134 (hydrogen fluoride) hazardous waste code as described in an IDEQ letter of August 25, 1999. IDEQ will continue to facilitate implementation and refinement of this U134 site-specific treatment variance by conducting required public participation activities prior to the actual on-site disposal. Should the results of these public participation activities prove overwhelmingly negative, this site-specific treatment variance may be rescinded.	Response: This sentence has been deleted from the comment column.	
31	<u>Section 4.5 Plans for Minimizing Environmental and Public Impacts, page 4-8, bullets</u>		Please add a bullet emphasizing the need for a thorough visual inspection of the cylinder as it is excavated to look for any defects that may make it unsafe to move.	Response: A bullet has been added requiring the visual inspection of excavated cylinders as requested.	
32	<u>Section 5.1 Mobilization, page 5-1 and 5-2, bullets</u>		Where will the CRV be if it is needed?	Response: This section has been revised to indicate that the CRV will be brought on-site if cylinders with defective valves are retrieved from the excavation site.	
33	<u>Section 5.3</u>		Where does the requirement of segregating the cylinder groups 30 feet apart come from?	Response: A reference has been added to this	

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	<u>Cylinder Segregation and Staging, page 5-3, first paragraph, last sentence</u>		Please list a reference.	section to CGA P-22, " <i>The Responsible Management and Disposition of Compressed gases and their Containers</i> " (1995), where this requirement is established.	
34	<u>Section 5.4 Cylinder Sampling, page 5-4, first paragraph, fourth sentence</u>		Replace " <i>in operable</i> " with inoperable.	Response: This change has been made as requested.	
35	<u>Section 5.6 Cylinder Treatment, page 5-5, second sentence</u>		Replace the word " <i>benign</i> ." See comment number 18.	Response: The word benign has been replaced throughout the document as described in the response to comment 18.	
36	<u>Section 6.3 INEEL NEPA Documentation, page 6-1</u>		Natural resources are discussed in the paragraph, however cultural resources are not. Please state if there is a cultural resource concern, and provide a reference to the procedure if natural or cultural resources are discovered during the project. Did the NEPA evaluation conclude that the proposed remedial action would be "categorically excluded" from NEPA review? Please provide a reference to the NEPA evaluation in the Reference section.	Response: The title of this section and the discussion of NEPA were incorrect. This section has been revised to address the post-ROD follow-on environmental evaluations that DOE has performed to ensure continued compliance. In accordance with DOE's 1994 NEPA/CERCLA integration policy, NEPA values are integrated into CERCLA documents. When integration occurs, separate NEPA documents are not produced for CERCLA activities. This integration provides a more cost-effective and efficient approach that would decrease scheduling and funding conflicts, eliminate redundant public involvement, and reduce the time and costs of document development while satisfying the regulatory requirements of both laws. DOE implemented the NEPA/CERCLA integration in the development of the <i>Final Record of Decision, Idaho Nuclear Technology and Engineering Center, Operable Unit 3-13</i> , issued in October, 1999. During ROD development, DOE incorporated NEPA values to the extent practical.	

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37	<u>Section 6.5 Evaluation of Remedial Action Against Performance Measurement Points, page 6-2, fifth sentence</u>		Please refer to comment number 22 regarding pre-final and final inspections.	Response: The following note was added to the paragraph: “It may be determined that the pre-final is the only inspection needed, if this is the case, a final inspection will not be conducted, and the pre-final will serve as the final inspection.”	
38	<u>Section 6.9 Remedial Action Reporting, page 6-3, second paragraph, first sentence</u>		Please change “ <i>Manages</i> ” to Managers.	Response: See response to USEPA region X comment #14.	
39	<u>Section 6.9 Remedial Action Reporting, page 6-3, last bullet</u>		According to the FFA Section XXV, the site may be issued a notice of completion, however, deletion from the NPL will only occur after completion of all remedial action for the INEL.	Response: This section has been revised to indicate that documentation will be included in the RA report to support a notice of completion. In response to comments received from EPA Region X, this bullet has been revised to state that the documentation will be sufficient to support that no further remedial action, including institutional controls, is required. The language discussing the deletion from the NPL will be removed.	
40	<u>Section 6.12 Waste Management Plan, page 6-4</u>		The bullets contain slightly different elements of information than the bullets in Attachment 4 of the Waste Management Plan section 3 Projected Waste Streams. Please make both sets consistent.	Response: The bullets in Section 6.12 of the RD/RA WP and the bullets/headings in Section 3.0 of the Waste Management Plan have both been revised to make them consistent.	
41	<u>Section 6.13 Data Management Plan, page 6-5, last set of bullets</u>		Please note the condition of each cylinder and provide it as data to be managed under this plan.	Response: A bullet has been added to the second set of bullets in Section 6.13 requiring the condition of each cylinder to be recorded.	
42	<u>Section 6.16 Operations and Maintenance</u>		A normal “Operations and Maintenance plan” may not be required for this type of remedy, however, some sort of tracking is required to ensure that backfill areas are periodically checked for subsidence and repaired as necessary.	Response: This section has been revised in accordance with comments received from EPA Region X to state that a backfill material will be used that is sufficient to allow for compaction, therefore reducing the potential for subsidence in the shallow excavation areas. This has also been	

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				revised to indicate that the area will be evaluated for subsidence as part of the 5-year project review.	
43	<u>Section 6.19 Mobilization, page 6-7, last paragraph, last sentence</u>		It is stated that all procedures, including emergency response procedures, will be periodically implemented on a test basis. Please state where this will be documented and provide a reference to this requirement if available.	Response: Results of these procedure implementation tests will be recorded in the project notes and field logs, and will be included as part of the final RA report. The text has been revised to reflect this.	
44	<u>Section 6.20.1 Objectives and Approach, page 6-11, last paragraph</u>		Reword sentence " <i>Mechanical excavation techniques using a track-hoe excavator fitted with a flat "toothless" bucket will be used in the cylinders are greater than 6-inches below surface or laterally.</i> " Insert "that" between "cylinders" and "are." Replace "in" with "for." Insert "stacked" before " <i>laterally.</i> "	Response: This has been reworded as requested.	
45	<u>Section 6.20.1 Objectives and Approach, page 6-11, last paragraph, last sentence</u>		How will the preliminary inspection " <i>confirm</i> " what the gases are? Will this be a visual inspection of cylinder labels? What if labels are not present? Will this include taking a sample from cylinders with operable valves? What will be done about cylinders that have no apparent markings and inoperable valves? Please provide some direction here or reference where in the document this information can be found.	Response: This preliminary inspection is described in detail in section 6.20.2.2.4. A reference has been added to the paragraph in section 6.20.1 to that section.	
46	<u>Section 6.20.2.1.2 Hazards Identification and Reduction, page 6-13, last paragraph</u>		Add " <i>during activities or are found in a breached state.</i> " to the last sentence.	Response: This change has been made as requested.	
47	<u>Section 6.20.2.2.4 Methods, page 6-16, item number 13, fourth sentence.</u>		Replace " <i>digs</i> " with "dings."	Response: This change has been made as requested.	
48	<u>Section 6.20.2.4.2 Hazards Identification, page 6-20, first paragraph, last sentence</u>		State the instrument(s) to be used to take the headspace reading.	Response: Section 6.20.2.4.3 describes the equipment and materials used for air monitoring. Section 6.20.2.4.4 describes the methods used to conduct the air monitoring and soil headspace gas sampling. The second paragraph of 6.20.2.4.4 describes that soil headspace will be conducted using a photo-ionization detector. Since this information is already in the work plan, no changes	

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				were made.	
49	<u>Section 6.20.2.4.2 Hazards Identification, page 6-20, second paragraph, last sentence</u>		Reword sentence to state "If a cylinder that contains dense gases ruptures, displacement of oxygen at the bottom of the excavation could occur." Please state the procedure in the occurrence of this unlikely event (i.e. evacuation followed by sampling by team members in appropriate levels of PPE, etc.)	Response: "Displacement" has been replaced with "displacement". A sentence has been added that indicates if this condition occurs, work will immediately cease, personnel will be evacuated from the area, and personnel in appropriate levels of PPE will conduct sampling in area in which the release has occurred. Work will not resume until the conditions are deemed safe.	
50	<u>Section 6.20.2.4.4 Methods, page 6-21, second paragraph</u>		What are the criteria to perform a laboratory sample of any stained or discolored soils? For example, what if the PID reading is questionable? Or what if the reading is extremely high or unknown? Certain conditions may necessitate the sending of a sample to the lab.	Response: Section 6.20.2.4 specifically describes air monitoring of the excavation area. The sampling of stained soils referred to in this section is being conducted solely for the purposes of determining whether concentrations of potential contaminants are present in levels that will prohibit safe entry to the excavation area. Laboratory analysis of the soil sample will not be required to make this determination. Soil sampling is described in the Preliminary Characterization Plan (attachment 1) of the RD/RAWP. No changes have been made to this section based on this comment since the characterization plan addresses laboratory analysis requirements. The soil sampling plan will address sampling of stained materials and the analysis of these materials will be done in a laboratory.	
51	<u>Section 6.20.3.1.4 Methods, page 6-23, first paragraph, third sentence</u>		Please change "Register" to "Registered."	Response: This change has been made as requested.	
52	<u>Section 6.20.3.1.4 Methods, page 6-23, last paragraph</u>		Are the 50-feet and 30-feet requirements from the CGA rules? Please state a reference for these requirements.	Response: This requirement is established in CGA P-22 "The Responsible Management and Disposition of Compressed Gases and Their Containers" (1995). A reference to this CGA has	

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				been added to the text.	
53	<u>Section 6.20.4.1.4 Methods, page 6-25, second paragraph</u>		Please change "with" to "within."	Response: This change has been made as requested.	
54	<u>Section 6.20.4.3 Robotic Excavation, page 6-26, first paragraph</u>		The statement that "Robotic equipment will not be mobilized to the site" is not necessarily true. A better way to word the sentence would be something to the effect that "robotic equipment will be mobilized to the site only if cylinders are too dangerous for personnel to be near."	Response: This sentence has been revised as follows: "Robotic equipment will not be mobilized to the site unless cylinders are identified that are determined to be too dangerous to allow personnel to perform the removal action."	
55	<u>Section 7 Sampling, Treatment, and Disposal, page 7-1, last sentence</u>		Please reference the section of the document that states where the different types of cylinders will be disposed.	Response: The first sentence on this page already states that this section describes the sampling, treatment, and disposal of the cylinders. Therefore, there is no need to repeat this again.	
56	<u>Figure 7-1 Cylinder Sampling and Treatment Flow Chart, page 7-2</u>		The "no" is missing from the bottom of the two diamonds "Are contents toxic?" and "Are contents inert gases?" A path should be inserted for empty cylinders (those with no content). The document discusses treatment options such as flaring, chemical and thermal oxidation for the flammable gases, however, the flow chart only addresses thermal oxidation. On-site treatment may be a better phrase.	Response: These changes have been made as suggested.	
57	<u>Table 7-1 Specific Calibration and Operation Data, page 7-5</u>		Please add BFB to the list of acronyms.	Response: This change has been made as requested.	
58	<u>Section 8.3 Data Management and Inventory Control</u>		Please see comments regarding attachment 5, Data Management Plan.	Response: The reference to DOE Order 1324.2A has been changed to 1324.2B for the filed data. A reference has been added to DOE order 1324.5B for the management of electronic data.	
59	<u>Section 8.4.3 Remedial Action</u>		Please see comment number 22 regarding pre-final and final inspections. For example, following the bullet "Date of final inspection" could be (if necessary).	Response: A note has been added to this section that indicates if a final inspection is deemed not	

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	<u>(RA) Report, page 8-4 and 8-5</u>			necessary, the pre-final inspection will serve as the final inspection.	
60	<u>Section 8.4.3 Remedial Action (RA) Report, page 8-4, last sentence</u>		Please see comment number 42 regarding deletion of the site from the NPL.	Response: This section has been revised to indicate that documentation will be included in the RA report to support a notice of completion. In response to comments received from EPA Region X, this bullet has been revised to state that the documentation will be sufficient to support that no further remedial action, including institutional controls, is required. The language discussing the deletion from the NPL will be removed.	
61	<u>Attachment 1: Table 2-1 Pre-removal data quality objectives of OU 3-13 Group 6, page 2-2</u>		Please reword the last paragraph of Step 5, Decision Rules.	Response: This has been reworded to read: "IF buried metal objects are detected, THEN survey specialists and project managers will evaluate the data in making remediation decisions."	
62	<u>Attachment 1: Section 4.1 Sample Equipment and Supplies, page 4-1, 17th bullet</u>		Is demonized water the opposite of holy water? (Spell checker loves to substitute demonized for deionized).	Response: This has been changed to "deionized"	
63	<u>Attachment 1: Section 4.3 Sample Documentation and Management, page 4-2, second paragraph, last sentence</u>		"Dares" should be DARs.	Response: This change has been made as requested.	
64	<u>Attachment 1: Section 5.2 Waste Disposal, page 5-1, second</u>		Form 0435.39 is listed as the Waste Determination and Disposition Form (WDDF) in MCP-3472, please correct throughout the document.	Response: The acronym has been changed throughout the document to "WDDF".	

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	<u>sentence</u>				
65	Attachment 1: <u>Section 5.2.2 Soil Specific Waste Management, page 5-2, second paragraph</u>		Correct " <i>demonized water.</i> "	Response: This has been changed to "deionized".	
66	Attachment 1: <u>Section 6.1.1 Quality Assurance and Quality Control Sampling, page 6-1, second sentence</u>		Correct " <i>representative ness</i> " to representativeness.	Response: This change has been made as requested.	
67	Attachment 1: <u>Section 6.2 Data Validation, Reduction, and Reporting, page 6-2</u>		Please change the reference to " <i>IDHW</i> " to IDEQ and also make the correction in the acronym list.	Response: This change has been made as requested.	
68	Attachment 4: <u>Section 1 Introduction, page 1-1, second paragraph, fourth sentence</u>		Please state the reference for this anecdotal evidence. For example section 3.1.1 of the RD/RA Workplan.	Response: This information has been added as requested.	
69	Attachment 4: <u>Section 2 Description of Remediation Activities, page 2-1, first bullet last sentence</u>		Thermal oxidation should be two words. The abstract states that treatment methods include both thermal and chemical oxidation.	Response: The typographical error has been corrected. Chemical oxidation was added to the sentence for consistency with the abstract.	
70	Attachment 4: <u>Section 4.1.1</u>		It should be stated that the quantities of the inert gases include the cylinders for a total of 500 kg for each type of gas.	Response: This sentence has been re-worded as follows:	

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	<u>Inert gases, page 4-1, last sentence</u>			"Quantities of inert gases are estimated to be a total of 500 kg for each type of gas <i>including the weight of the cylinders.</i> "	
71	Attachment 4: <u>Section 4.1.2 Empty Inert Gas Cylinders, page 4-1, second sentence</u>		Please state the cylinders will be rendered inoperable by removing valves and cutting.	Response: A sentence has been added as follows: "Empty cylinders will be rendered inoperable by removing the valves, and either cutting or puncturing each cylinder."	
72	Attachment 4: <u>Table 5-1 CPP-84 Waste Quantities and Classification, page 5-1</u>		If 50 of the cylinders are supposed to be acetylene (estimated quantity of 900 kg), why do the remaining 50 cylinders of inert gases have a quantity of 3000 kg?	Response: The volumes of the acetylene are based on documented evidence. The other gases are conservatively estimated based on the maximum number of expected cylinders and assuming each cylinder is full. A note has been added to the table providing a reference to the method used to estimate each quantity.	
73	Attachment 4: <u>Section 6 Waste Management Plan, page 6-1, first sentence</u>		It is unclear what is meant by " <i>company registered CERCLA storage areas.</i> " It would seem that storage and treatment areas for RCRA hazardous waste in the vicinity of the excavation site would be considered temporary units pursuant to IDAPA 58.01.05008 (40 CFR 264.553).	Response: This section has been revised to indicate that CERCLA wastes with RCRA characteristics will be managed in an area that meets the substantive requirements of 40 CFR 264.553. Container storage of these wastes will be conducted in accordance with substantive requirements in 40 CFR 264.170 through 179. The WMP has been revised to clearly indicate this.	
74	Attachment 4: <u>Section 6.1 Waste Management Plan, page 6-2, second paragraph, first sentence</u>		This sentence should be clarified to indicate that cylinders containing flammable gases are CERCLA wastes that will be managed in accordance with the substantive aspects of the storage requirements in IDAPA 58.01.05.008 (40 CFR 264.170 through 179).	Response: CERCLA wastes having RCRA characteristics, such as cylinders containing flammable gas, will be managed in an area that meets the substantive requirements of 40 CFR 264.553. Container storage of these wastes will be conducted in accordance with substantive requirements in 40 CFR 264.170 through 179. The WMP has been revised to clearly indicate this.	
75	Attachment 4: <u>Section 7.1.1 Inert Gases, page</u>		What about other construction-type gases that may be found such as refrigerants? Freon and other refrigerants would probably have to be recovered and recycled.	Response: The gases listed in this section only include those gases that are expected to be present in area-84 based on the available evidence. A note	

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	<u>7-1, bulleted items</u>			will be added to this section that to indicate that if other gases are retrieved, they will be managed on a case by case basis to determine the proper treatment and disposition.	
76	Attachment 4: <u>Section 7.1.3</u> <u>Empty Inert Gas Cylinders, page 7-1</u>		See comment number 20.	Response: The second sentence has been revised to remove “and/or” and instead only use the word “and” so the valves are removed and the cylinder body is breached.	
77	Attachment 4: <u>Section 7.1.4</u> <u>Empty Acetylene Cylinders, page 7-1, fourth sentence</u>		Change “of” to “or.”	Response: This change has been made as requested.	
78	Attachment 4: <u>Section 8.2 Waste Management Plan, Page 8-1, Last Sentence</u>		The IDEQ supports a site-specific treatment variance requested for non-liquid wastes assigned the U134 (hydrogen fluoride) hazardous waste code as described in an IDEQ letter of August 25, 1999. IDEQ will continue to facilitate implementation and refinement of this U134 site-specific treatment variance by conducting required public participation activities prior to the actual on-site disposal. Should the results of these public participation activities prove overwhelmingly negative, this site-specific treatment variance may be rescinded. Please clarify this sentence regarding which regulation the potential U-134 variance provides relief for.	Response: This sentence referencing the variance has been deleted based on additional input from IDEQ.	
79	Attachment 4: <u>Section 10.3</u> <u>Waste Shipment, page 10-2, first bullet</u>		Change “From” to “Form.”	Response: This change has been made as requested.	
80	Attachment 5: <u>Acronyms, pages vii and viii</u>		Please add MCP and L&V.	Response: This change has been made as requested.	
81	Attachment 5: <u>Table 1-1 Data Covered by this Data Management</u>		Geophysics such as ground penetrating radar were discussed as used at the sites, will this data also be captured?	Response: All data collected during the course of this project will be collected and properly managed. The table contains examples of the types of data that will be included and is not meant to imply other data will not be collected. A note has been added to the	

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	<u>Plan, page 1-2</u>			table clarifying that all data generated will be managed appropriately.	
82	Attachment 5: <u>Section 2.2 Data Flow, page 2-2, third sentence</u>		The sentence states that non-chemical analytical data follow the paths in Columns 2 and 3, however, Figure 2-1 shows the chemical data in columns 2 and 3.	Response: The sentence has been revised to indicate that columns 2 and 3 show the pathway for chemical data.	
83	Attachment 5: <u>Figure 2-1 Data Management System Flow Chart, page 2-3</u>		Where does OIS fit in on this flow chart?	Response: OIS is an electronic scanned version of hard-copy field data, therefore column 4 shows the pathway for managing this data. The last box in column 4 has been revised to include OIS.	
84	Attachment 5: <u>Section 4 Field Activities, page 4-1, second paragraph</u>		According the Department of Energy Directives Home Page on the World Wide Web, DOE Order 1324.2A (4/9/92) is superceded by current DOE Order 1324.5B (7/19/96). DOE order 1324.5b also provides guidance on electronic data (could not find DOE order 1324.6).	Response: This section has been revised to reference the most current applicable DOE orders affecting data management.	
85	Attachment 5: <u>Section 4.3 Field Logs, pages 4-1 and 4-2, bullets</u>		Will weather conditions be noted in Field Logs? This is helpful for identifying sampling conditions.	Response: This information will be included in the field logs. A bullet has been added requiring weather conditions.	
86	Attachment 5: <u>Section 6 Data Reduction and Presentation, page 6-1</u>		It would be useful to capture data such as cylinder condition in tables and text.	Response: A bullet has been added to the tables and text section for cylinder condition.	